



State of Utah

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Lieutenant Governor

Department of Environmental Quality

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Acting Executive Director

DIVISION OF AIR QUALITY
Cheryl Heying
Director

DAQE-IN0109200007-09

January 20, 2009

Steve Neely
Horizon Milling, LLC
2780 G Avenue
Ogden, UT 84401

Dear Mr. Neely:

Re: Intent to Approve: Modification to Approval Order DAQE-AN0920004-02 by Adding Four New Baghouses; Weber County; CDS B; Nonattainment and Maintenance Area
Project Number: N010920-0007

The attached document is the Intent to Approve for the above-referenced project. The Intent to Approve is subject to public review. Any comments received shall be considered before an Approval Order is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an Approval Order. An invoice will follow upon issuance of the final Approval Order.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. The project engineer for this action is Mr. Alan Humpherys, who may be reached at (801) 536-4142.

Sincerely,

John T. Blanchard, Manager
Minor New Source Review Section

JTB:AH:sa

cc: Weber-Morgan Health Department

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: Modification to Approval Order
DAQE-AN0920004-02 by Adding Four New Baghouses**

Prepared By: Mr. Alan Humpherys, Engineer

Phone: (801) 536-4142

Email: ahumpherys@utah.gov

INTENT TO APPROVE NUMBER

DAQE-IN0109200007-09

Date: January 20, 2009

Ogden Flour Mill

Source Contact:

Mr. Steve Neely

Plant Supervisor

Phone: (801) 621-3540

**John T. Blanchard, Manager
Minor New Source Review Section
Utah Division of Air Quality**

ABSTRACT

Horizon Milling, LLC has requested a modification to their AO to add four new baghouses to their facility. One of these four baghouses will replace an existing baghouse and the other three will control emissions from various flour milling and cleaning activities. 40 CFR Part 60 Subpart DD: Standards of Performance for Grain Elevators, does not apply to this facility because the combined capacity of the storage elevators is less than 88,100 cubic meters (2.5 million U.S. bushels).

The potential emissions, in tons per year, will change as follows: $PM_{10} + 7.93$

The changes in emissions will result in the following, in tons per year, potential to emit totals: $PM_{10} = 39.88$, $NO_x = 14.06$, $SO_2 = 0.78$, $CO = 3.58$, $VOC = 0.67$

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in the Ogden Standard Examiner on January 24, 2009. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

Name of Permittee:

Horizon Milling, LLC
2780 G Avenue
Ogden, UT 84401

Permitted Location:

Horizon Milling, LLC: Ogden Flour Mill
2780 G Avenue
Ogden, UT 84401

UTM coordinates: 416,380 m Easting, 4,562,900 m Northing

SIC code: 2041 (Flour & Other Grain Mill Products)

Section I: GENERAL PROVISIONS

- I.1 All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
- I.2 The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
- I.3 Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]

- I.4 All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401]
- I.5 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
- I.6 The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring. [R307-150]
- I.7 The owner/operator shall comply with UAC R307-107. General Requirements: Unavoidable Breakdowns. [R307-107]

Section II: SPECIAL PROVISIONS

II.A The approved installations shall consist of the following equipment:

- II.A.1 **Flour Mill**
- II.A.2 **One (1) Boiler**
Fuel: Natural Gas
Burner Rating: Less than 5 MMBTU/hr
- II.A.3 **One (1) Switch Engine (locomotive)**
Fuel: Diesel Fuel
Power Rating: 600 hp
- II.A.4 **E-01**
Service Area: Elevator, Garner, Scales & Distribution
Exhaust Flow Rate: 12,800 ACFM Installed Date: 1968
- II.A.5 **E-06**
Service Area: Elevator Basement & Truck Receiving
Exhaust Flow Rate: 20,750 ACFM Installed Date: 1979
- II.A.6 **E-08**
Service Area: Mill Feed Load-out Conveyors
Exhaust Flow Rate: 11,700 ACFM Installed Date: 1971

II.A.7	E-09 Service Area: Grain Load-out System Exhaust Flow Rate: 2,500 ACFM	Installed Date: 1977
II.A.8	E-10 Service Area: Wheat Cleaning System Exhaust Flow Rate: 13,000 ACFM	Installed Date: 1971
II.A.9	M-01 Service Area: Flour Mill, Roll Suction Exhaust Flow Rate: 11,480 ACFM	Installed Date: 1958
II.A.10	M-03 Service Area: South Mill Purifiers 1-6 Exhaust Flow Rate: 9,840 ACFM	Installed Date: 1958
II.A.11	M-04 Service Area: North Mill Purifiers 7-9 & Bran Finishers Exhaust Flow Rate: 9,840 ACFM	Installed Date: 1958
II.A.12	M-07 Service Area: General Suction-All Mill Scales, Conveyors, Pin Mill Equipment & Flour Bins Exhaust is vented internally and not discharged to the atmosphere	
II.A.13	M-08 Service Area: All Whole Wheat Equipment Exhaust is vented internally and not discharged to the atmosphere	
II.A.14	M-09 Service Area: Mill Pneumatics System Exhaust Flow Rate: 17,500 ACFM	Installed Date: 1988
II.A.15	M-10 Service Area: Aspirators, Brk Rolls and Mill Legs Exhaust Flow Rate: 22,036 ACFM	Installed Date: 2009
II.A.16	M-11 Service Area: Mill Pneumatics System Exhaust Flow Rate: 22,036 ACFM	Installed Date: 2009
II.A.17	CH-01 Service Area: Grinding Bin, Combinators, 2nd Temper Entoleters and Leg Exhaust is vented internally and not discharged to the atmosphere	
II.A.18	CH-05 Service Area: Wheat Cleaning Equipment Exhaust Flow Rate: 23,400 ACFM	Installed Date: 1980

- II.A.19 **CH-07**
 Service Area: Screenings Grinding
 Exhaust Flow Rate: 1,600 ACFM Installed Date: 1999
- II.A.20 **CH-08**
 Service Area: Wheat Cleaning Equipment
 Exhaust Flow Rate: 22,036 ACFM Installed Date: 2009
- II.A.21 **P-01**
 Service Area: Bulk-All Truck and Rail Loading Equipment
 Exhaust Flow Rate: 22,036 ACFM Installed Date: 2009
- II.A.22 **P-05**
 Service Area: Small Pack-All 5, 10, and 25 pound Pack Equipment
 Exhaust is vented internally and not discharged to the atmosphere
- II.A.23 **P-06**
 Service Area: Ingredient Cut-In Equipment
 Exhaust is vented internally and not discharged to the atmosphere
- II.A.24 **P-07**
 Service Area: Elevator Load/Unload Bin Vent
 Exhaust Flow Rate: 200 ACFM Installed Date: 2002
- II.A.25 **P-08**
 Service Area: Large Pack - All 50 pound Pack Equipment
 Exhaust is vented internally and not discharged to the atmosphere
- II.A.26 **Millfeed Loadout Equipment**
 Flour/bran Mill Loadout Equipment includes:
1. A conveyor of the type that is designed to raise and lower to the top of the truck, which will reduce open freefall and choke feed the remainder of the load.
 2. A quick opening/closing door system on the entrance to the existing loadout building.
- II.A.27 **Truck Grain Receiving Pit**
1. Baffles below the grating
 2. A quick opening/closing door system on the entrance to the existing receiving building
 3. Aspiration below the baffles to baghouse E-06

II.B Requirements and Limitations

II.B.1 The Ogden Flour Mill shall be subject to the following

II.B.1.a The owner/operator shall notify the Executive Secretary in writing when the installation of baghouses CH-08, M-10, M-11, and P-01 has been completed and is operational. To ensure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If the construction and/or installation has not been completed within 18 months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the construction and/or installation. At that time, the Executive Secretary shall require documentation of the continuous construction and/or installation of the operation and may revoke the AO. [R307-401-18]

II.B.1.b A manometer or magnehelic pressure gauge shall be installed to measure the differential pressure across the fabric filters in the following baghouses: E-01, E-06, E-09, E-10, M-01, M-03, M-04, M-09, M-10, M-11, CH-05, CH-07, CH-08, and P-01. Static pressure differential across the fabric filter shall be between 1.5 to 6.0 inches of water column. The pressure gauge shall be located such that an inspector/operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 1.0 inches water column. Intermittent recording of the readings are required on a once per operational day basis. [R307-401]

II.B.1.c The owner/operator shall not consume in the on site equipment more than 110,200,000 standard cubic feet of natural gas per rolling 12-month period. [R307-401]

II.B.1.c.1 To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of natural gas consumption shall be kept for all periods when the plant is in operation. Natural gas consumption shall be determined by examination of natural gas billing records. The records of natural gas consumption shall be kept on a daily basis. [R307-401]

II.B.1.d Visible emissions from the following emission points shall not exceed the following values:

- A. Switch engine - 15% opacity
- B. Truck/Railcar unloading station - 5% opacity
- C. Railcar loading station - 5% opacity
- D. Truck loading station - 10% opacity
- E. All baghouse exhaust stacks - 10% opacity
- F. All other points - 20% opacity. [R307-401]

II.B.1.d.1 Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-305]

- II.B.2 **All Haul Roads and Fugitive Dust Sources shall be subject to the following**
- II.B.2.a The in-plant paved haul road shall be periodically swept or sprayed clean as conditions warrant or as determined necessary by the Executive Secretary. Records of cleaning of the paved haul roads shall be kept for all periods when the plant is in operation. [R307-401]
- II.B.2.b The owner/operator shall conduct its operations in such a way to minimize fugitive dust and fugitive emissions and shall abide by all applicable requirements of R307-309. [R307-309]
- II.B.3 **All Fuels consumed on site shall be subject to the following**
- II.B.3.a The owner/operator shall use natural gas as a primary fuel in the boiler and may use propane as a backup fuel in the boiler. [R307-401]
- II.B.3.a.1 Propane may be used as an alternate fuel supply only during periods of natural gas curtailment. [R307-401]
- II.B.3.b The owner/operator shall use #2 fuel oil as fuel in the switch engine. [R307-401]
- II.B.3.c The sulfur content of any fuel oil or diesel burned by the owner/operator in the switch engine shall not exceed 0.50 percent by weight. [R307-203]
- II.B.3.c.1 The sulfur content shall be determined by ASTM Method D4294-89 or approved equivalent. Certification of used oil shall be either by the owner/operator's own testing or by test reports from the fuel oil or diesel fuel marketer. [R307-203]

PERMIT HISTORY

The final AO will be based on the following documents:

Is Derived From	Additional Information dated November 26, 2008
Is Derived From	Additional Information dated November 20, 2008
Is Derived From	Additional NOI Information dated October 21, 2008
Is Derived From	NOI dated September 29, 2008
Supersedes	DAQE-AN0920004-02 dated November 14, 2002

ACRONYMS

The following lists commonly used acronyms and their associated translations as they apply to this document:

40 CFR	Title 40 of the Code of Federal Regulations
AO	Approval Order
ATT	Attainment Area
BACT	Best Available Control Technology
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CDS	Classification Data System (used by EPA to classify sources by size/type)
CEM	Continuous emissions monitor
CEMS	Continuous emissions monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COM	Continuous opacity monitor
DAQ	Division of Air Quality (typically interchangeable with UDAQ)
DAQE	This is a document tracking code for internal UDAQ use
EPA	Environmental Protection Agency
HAP or HAPs	Hazardous air pollutant(s)
ITA	Intent to Approve
MACT	Maximum Achievable Control Technology
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOI	Notice of Intent
NO _x	Oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
PM ₁₀	Particulate matter less than 10 microns in size
PM _{2.5}	Particulate matter less than 2.5 microns in size
PSD	Prevention of Significant Deterioration
R307	Rules Series 307
R307-401	Rules Series 307 - Section 401
SO ₂	Sulfur dioxide
Title IV	Title IV of the Clean Air Act
Title V	Title V of the Clean Air Act
UAC	Utah Administrative Code
UDAQ	Utah Division of Air Quality (typically interchangeable with DAQ)
VOC	Volatile organic compounds